

Exhibit 14

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CHARLIE THORNTON,

Plaintiff,

v.

FEDEX GROUND PACKAGE

SYSTEM, INC.,

Defendant.

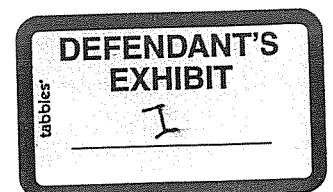
Case No.: 2:05cv00656 MWF (DRB)

PLAINTIFF'S INITIAL DISCLOSURES

COMES NOW Plaintiff in the above-styled matter and provides the following initial disclosures to the defendant:

PERSONS WITH DISCOVERABLE KNOWLEDGE

1. The Plaintiff Charlie Thornton. This witness will have knowledge of his contact with the defendant and the circumstances of his detrimental reliance. This witnesses home address is 75 Pine Court, Millbrook, Alabama 36054; telephone 334-285-7915.
2. Any and all persons who are agents, employees or otherwise related to the Defendant who have knowledge of Plaintiff's relationship with the Defendant.
3. Kent Gastineau, Montgomery FedEx Ground employee, will be able to testify as to contacts between Plaintiff and Defendant including the nature and scope of the relationship. This witness's address and telephone numbers are known by Defendant.
4. Chad Primus, Sterns Bank, approved loan for purchase/lease of truck/van and assisted Plaintiff in the sale or release of the purchase/lease agreement. This witness may also have information relevant to the business practices of Defendant. This witness's address is 500 13th Street, Albany, MN 56307; telephone 800-247-1922.
5. Jeff White, Atlanta FedEx Ground, discussed resolving problems with Plaintiff's contract was aware of issues regarding Plaintiff and administrative problems in the Montgomery office. This witness's address and telephone numbers are known by Defendant.
6. Omar Newman, FedEx Ground, promised to work with Plaintiff to resolve problems regarding contract. Will testify that the Montgomery office made administrative mistakes regarding Plaintiff. This witness's address and telephone numbers are known by Defendant.



7. Stan Trott, former manager FedEx Ground Montgomery, held informative seminar in which Plaintiff attended, discussed the business of contracting directly with Plaintiff. This witness's address and telephone numbers are known by Defendant.
8. Richard "Dick" Jene, directory of contractor relations, will testify that Plaintiff expressed concerns that Plaintiff was being mishandled by the Montgomery office. This witness's address and telephone numbers are known by Defendant.
9. Trisha Jones recruiter for Defendant. Held a seminar in which Plaintiff attended. This witness's address and telephone numbers are known by Defendant.
10. Darryl Clark recruiter for Defendant. Held a seminar in which Plaintiff attended. This witness's address and telephone numbers are known by Defendant.
11. Joe McConnell, FedEx Birmingham, Plaintiff discussed problems he was having with administrative problems in Montgomery, this witness will testify as to advise given Plaintiff in regard to problems Plaintiff was having. This witness's address and telephone numbers are known by Defendant.
12. Jermaine Wilson, FedEx Montgomery, helped train Plaintiff in Montgomery. Will testify that Plaintiff was willing and able to assume available routes. This witness's address and telephone numbers are known by Defendant. This witness's address and telephone numbers are known by Defendant.
13. Debbie Thornton, wife of Plaintiff, will be able to testify to information given at initial seminar and will testify as to Plaintiff's state of mind, well being, mental anguish, financial disposition and emotional distress. This witnesses home address is 75 Pine Court, Millbrook, Alabama 36054; telephone 334-285-7915.

DOCUMENTS

At present, Plaintiff is in possession of documents and things related to his relationship and contact with the Defendant. Among the documents and things in Plaintiff's possession are the following:

- P&D Contractors Guide
- Maps & D.O.T. Emergency Response Manuals
- Certificate of Registrations Truck
- Bill of Sale for Truck

- receipt from D.O.T. physical
- letters and contract regarding purchase of truck
- payment receipts regarding truck
- Identification Badge issued by Defendant
- FedEx Ground Uniforms/Shoes/Hats
- Instruction Booklet for use of scanner.
- P&D Participant Manual
- Gas Receipts for Truck
- Receipt for purchase of required shoes
- Accident Report Manual
- Insurance Coverage Documents/Protective Insurance
- P&D Maintenance Handbook
- P&D Learning Participant Manual
- Training evaluation reports.
- audio tape recordings of conversations between Plaintiff and Kent Gastineau, Chad Primus, Jeff White, and Omar Newman.

Plaintiff will supplement these disclosures if Plaintiff comes into possession of any relevant documents.

DAMAGES

Plaintiff, at this time, claims actual and punitive damages in the amount of \$850,000.00 as against Defendant for violations of Plaintiff's contractual rights; for actual damages, mental anguish, and emotional distress for the acts complained of.

INSURANCE COVERAGE

This is not applicable to Plaintiff herein.

Respectfully submitted this __20__ day of September, 2005.

ANDY NELMS (NEL022)
Attorney for Plaintiff

OF COUNSEL:

LAW OFFICES OF JAY LEWIS, L.L.C.
847 S. McDonough Street
P.O. Box 5059
Montgomery, AL 36103
(334) 263-7733

CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing on the following parties and/or counsel by placing a copy of the same in the United States mail, postage prepaid and properly addressed, or by hand delivery on this 20th day of September, 2005.

Robert Keeling Spotswood
Kenneth Daniel Sansom
John Robert Parker, Jr.
Spotswood, LLC
2100 Third Avenue, North
Concord Center, Suite 940
Birmingham, AL 35203

K. ANDERSON NELMS
P.O. Box 5059
Montgomery, AL 36103
Phone: (334) 263-7733
Fax: (334) 832-4390
andynelms@jaylewislaw.com
ASB-6972-E63K
Counsel for Plaintiff